

EXHIBIT 14

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DREW J. RIBAR,
Pro Se Plaintiff
3480 Pershing Ln
Washoe Valley, NV 89704
(775) 223-7899
Const2Audit@gmail.com

v.

WASHOE COUNTY, et al.

Defendants.

Case No.: 3:24-cv-00526-ART-CLB

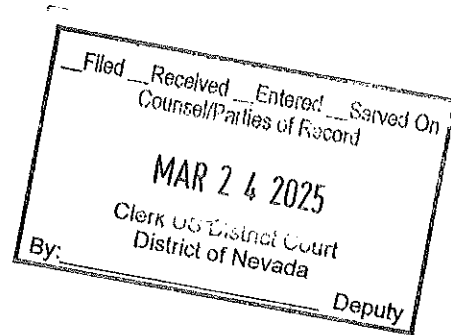


EXHIBIT 14

Title: Internal Communications Regarding Downtown Reno Library Drag Story Hour – Security
& Volunteer Coordination

Date: June 7, 2023

Source: Internal email correspondence between Washoe County Library System (WCLS)
officials and Build Our Center, Inc. (BOC)

Bates Number Range: EXH072-EXH074

PLEADING TITLE - 1

1 **Description:**

2
3 This exhibit consists of internal emails between Washoe County Library System (WCLS)
4 employees and Build Our Center, Inc. (BOC) regarding security and volunteer coordination for
5 the **Drag Story Hour (DSH) event at Downtown Reno Library**. The emails confirm direct
6 collaboration between government officials and a private advocacy organization, reinforcing
7 state action involvement.
8

9
10 **Key Participants:**

- 11
- 12 • **Tyna Sloan** – Librarian I, WCLS
 - 13 • **Judy Hansen** – Youth Services & Events Librarian, WCLS
 - 14 • **Beate Weinert** – Youth Services Manager, WCLS
 - 15 • **Jeff Scott** – Library Director, WCLS
 - 16 • **Jamie Hemingway** – Public Information Officer, WCLS
 - 17 • **Christopher Daniels** – BOC Representative, Drag Performer “Miss Ginger Devine”
 - 18 • **Stacey Spain** – Programs and Operations Manager, BOC
 - 19 • **Kelly Tanguay** – BOC Volunteer Coordinator
- 20
21

22 **Key Findings:**

23
24 **1. Security Control & Access Restriction:**

- 25 ○ Additional unarmed security was added.
- 26 ○ Volunteers from BOC’s “**Rainbow Brigade**” were assigned to **manage access**
- 27 **control, escort patrons inside, and buffer potential protesters.**
- 28

- Use of **wristbands to restrict event access** (1 parent/1 child policy) suggests viewpoint-based exclusion.

2. State Action by a Private Entity:

- BOC volunteers (private organization) were delegated official security functions at a **public event held in a government facility**.
- WCLS permitted BOC to **restrict public access** to certain areas, despite the library being a public forum.

3. Coordinated Event Planning Between WCLS & BOC:

- Walkie-talkies were distributed among volunteers and staff, evidencing **joint enforcement authority**.
- Library officials worked directly with BOC to **structure participant access**, violating content neutrality principles under the **First Amendment**.

Relevance to the Case:

1. First Amendment & Fourteenth Amendment Violations

- **Viewpoint Discrimination** – The selective access restrictions and coordination with a private advocacy group demonstrate **content-based censorship** at a public event (Knight First Amendment Inst. v. Trump, 928 F.3d 226 (2d Cir. 2019)).
- **Public Forum Doctrine Violation** – Public libraries are designated **limited public forums**, where the government cannot favor one viewpoint over another (Kreimer v. Bureau of Police, 958 F.2d 1242 (3d Cir. 1992)).

1 **2. Strengthens Monell Liability Against Washoe County**

- 2
- 3 • WCLS knowingly permitted a private advocacy group to dictate access restrictions
- 4 in a government facility, creating a state action nexus (*Lugar v. Edmondson Oil Co.*,
- 5 457 U.S. 922 (1982)).
- 6 • Joint enforcement authority over library operations supports liability under *Monell v.*
- 7 Dept. of Social Services, 436 U.S. 658 (1978).
- 8

9 **3. Refutes Defendants' Motion to Dismiss Build Our Center (BOC)**

- 10
- 11 • BOC acted under color of state law by performing government functions, making it a
- 12 state actor (*Adickes v. S.H. Kress & Co.*, 398 U.S. 144 (1970)).
- 13
- 14 • Reinforces claims that Washoe County and BOC engaged in coordinated
- 15 unconstitutional policies to restrict Plaintiff's rights.
- 16

17

18 **CERTIFICATION OF AUTHENTICITY**

19

20 I, **Drew J. Ribar**, certify under penalty of perjury that the attached documents in **Exhibit 14** are

21 true and correct copies of communications obtained through public records requests and

22 discovery, related to the **Downtown Reno Library Drag Story Hour** on June 7, 2023.

23

24 **Dated:** March 17, 2025

25 **Signed:**

26 */s/ Drew J. Ribar*

27

28

1 **Drew J. Ribar, Pro Se Plaintiff**

2 3480 Pershing Ln

3 Washoe Valley, NV 89704

4 (775) 223-7899

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PLEADING TITLE - 5

From: Sloan, Tyna <TSloan@washoecounty.gov>
Sent: 07 June 2023 00:12
To: Hansen, Judy; Weinert, Beate; Hoops, Emily E.; Gundeman, Jerome; Sevier-Dyer, Marie; Kinney, Justin; Welman, Seth; McLaughlin, Sasha; Bansen, Helen; Ryan, Kristen; Stears, Debi D; Scott, Jeff; Hemingway, Jamie; Andrews, John
Cc: MacMillan, Jana; Bowen, Jonnica L.; Ullman, Julie; stacey@ourcenterreno.org; kelly@ourcenterreno.org; 'Christopher Daniels'
Subject: Downtown Reno Library Drag Story Hour
Attachments:

Hello staff volunteers!

Thank you all so much for stepping up and out to help with our Drag Story Hour! We have had our final DSH Committee meeting and ironed out all the details.

All hands on deck at 9:30 am for a security debriefing meeting.

We will have our regular security plus an additional unarmed guard. RN staff will have their walkie-talkies and provide staff volunteers with one when possible. Communication is our friend!

*Jonnica can you please lend us some of your walkie-talkies, about 6.

Our Center has confirmed 24 volunteers (Rainbow Brigade) for our site. Volunteers will be stationed in the front of the library spreading joy and escorting participants into the building if necessary. They will also be supporting the library indoors and we will do our best to communicate where we may need additional support. For example, we would like some Rainbow Brigade friends on level 4 to provide a buffer from possible onlookers and a few for the parade from the auditorium to YPL.

Our event is scheduled from 10:00 am to noon.

10:00 - 10:25 Wristbands will be distributed and usher patrons to the auditorium. Due to capacity, we will be allowing 1 parent/1 child to participate.

10:30 - 11:00 Storytime in the auditorium followed by a parade with the Umbrella Brigade up to the Young People's Library.

11:00 - noon Crown/tiara craft, pronoun button-making station, photo-op with Miss Ginger Devine, and PAWS 2 Read.

Please take a moment to review the program "desk" schedule below.

EXH072

Additional details:

- Helen, Debi, and Kristen will hand out wristbands and manage capacity and the queue. Last year our event was pretty quiet, so we will use our flexing skills to determine how to proceed the day of. The backup plan for a large turnout is to have folks queue up outside and provide chalk for littles to draw as they wait. If there is a smaller crowd or trickle of folks they will be directed into the building.

- Jerome, Hoops and Sasha will set up and manage the crown/tiara craft and pronoun button table in the YPL area.

*After storytime, Justin and I will come upstairs to help with crowd control and crafts as needed.

- Judy and Marie, please help Ginger make the transition from the auditorium to the YPL when story time finishes. Follow the parade!

- Helen and Seth, please bring up the rainbow backdrop after storytime to stage an area for a photo opportunity with Miss Devine. We will have the area designated with chairs

I look forward to seeing you all and thank you so much for supporting this wonderful event. If you have any questions, need clarification, or suggestions please let me know.

Kindest regards,

Tyna

EXH073

Tyna Sloan
Librarian II | Washoe County Library System
tsloan@washoecounty.gov | Office: 775.327.8310
301 S. Center Street, Reno, NV 89502
My work schedule is Sunday - Thursday.

EXH074